

EXHIBIT “A”



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November 15, 2021

VIA EMAIL: courtney@lutheranmanor.com
AND REGULAR MAIL

Courtney Doheny, Executive Director
LUTHERAN MANOR OF THE LEHIGH VALLEY, INC.
2085 Westgate Drive
Bethlehem, PA 18017

**RE: Zenia Browne and [REDACTED] v. Lutheran Manor Apartments
of the Lehigh Valley, Inc.**

Dear Ms. Doheny:

Please be advised that I represent Zenia Browne and [REDACTED]. Ms. Browne and [REDACTED] were terminated by you and Lutheran Manor on November 5, 2021 in retaliation for protected activity. Specifically, as you are well aware, [REDACTED] brought complaints to the Board of Directors regarding gross mismanagement and gross waste of federal funds. Ms. Browne was a witness who provided evidence of your gross mismanagement and gross waste of federal funds. Both Ms. Browne and [REDACTED] were assured that their reports of your misconduct would be kept confidential. Unfortunately, the Board chose to ignore their promises of confidentiality and informed you of both of my clients' roles in their investigation of your misconduct. Upon learning of my clients' roles in bringing to light your inappropriate conduct, you have begun a campaign of reprisals against them, leading to their illegal termination on November 5, 2021.

You have provided each of my clients with an identical letter stating the same reason for their termination and providing them with a proposed Severance Agreement. Please be advised that the request for my clients to execute the Severance Agreement is explicitly rejected. You and Lutheran Manor have chosen to compound your mismanagement of federal funds by further violating federal law in your illegal termination of my clients. Moreover, you have fired [REDACTED] in violation of the Pregnancy Discrimination Act and the Pennsylvania Human Relations Act. The evidence of pregnancy discrimination is manifest as you informed [REDACTED] "I don't want to have to pay for maternity leave if you're not coming back" and

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informing her that she was the only person ever to take maternity leave at Lutheran Manor. As such, you are well aware of my client's protected status as a pregnant individual and chose to terminate her to avoid having to pay maternity leave benefits.

My clients are fully prepared to begin the whistleblower process with HUD's Office of Inspector General. If you would like to attempt to resolve this matter commensurate with the significant losses suffered by my clients as the result of your illegal termination, then we will be open to discussion. Otherwise, we are fully prepared to proceed with the process before the Office of the Inspector General and ultimately we are prepared to litigate this matter in federal court.

You are further advised that my clients believe that electronically stored information may be relevant to their claims against Lutheran Manor. This matter requires preservation of all information from Lutheran Manor's computer systems, removeable electronic media, and other locations. This includes, but is not limited to, email and other electronic communications, word processing documents, spreadsheets, databases, calendars, telephone logs, contact manager information, internet usage files, and network access information. This further includes text messages contained on Lutheran Manor employees' cellular devices or other smart devices.

All the information contained in this letter should be preserved for the following dates and time periods, January 1, 2020 and continuing. The laws and rules prohibiting destruction of evidence applies to electronically stored information in the same manner as they apply to other evidence. Due to its format, electronic information is easily deleted, modified or corrupted. Accordingly, Lutheran Manor must take every reasonable step to preserve this information until the final resolution of this matter. This includes, but is not limited to an obligation to: discontinue all data destruction and back-up tape recycling policies; preserve and not dispose of relevant hardware unless an exact replica of the file (a mirror image) is made; preserve and not destroy passwords, encryption procedures (and accompanying software); network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction software and maintain all other pertinent information until it is needed to access, review and reconstruct necessary access, view and/or reconstruct all requests for potentially relevant electronic data.

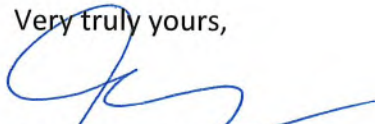
This matter requires preservation of all information from Lutheran Manor and covers Lutheran Manor's employees' computer systems, removeable electronic media and other information relating to the termination of Ms. Browne and [REDACTED], the employment of Ms. Brown and [REDACTED] and the investigation into yourself.

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Please forward this letter onto your legal counsel and we will await their prompt response. If we don't hear from counsel within five (5) days of today, we will infer you are not interested in resolution and proceed with the OIG. Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Very truly yours,



STEVEN E. HOFFMAN

SEH/ked

cc: Zenia Browne (via email: zeniabrowne@gmail.com)

[REDACTED]

Raymond C. Hittinger (via email: rchittinger@gmail.com)

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